

of time for Defendant to file its answer while the parties continue to explore settlement and engage in fruitful discussions would be beneficial and an effective use of resources. Given the intervening holiday, the parties agree that extending the time for Defendant to file its answer until August 18, 2017, is not unreasonable.

6. This motion is not made to interpose delay or hinder the prosecution of Plaintiffs' claims, and extending the time for Defendant to file its answer will not cause prejudice to Plaintiffs or any other party.

WHEREFORE, the parties respectfully move this Court to enter an Order permitting Defendant to file its respective answer to Plaintiffs' Complaint on or before August 18, 2017.

Respectfully submitted,

LOWENBAUM LAW

ARNOLD, NEWBOLD, WINTER &
JACKSON, P.C.

/s/ David P. Frenzia

Corey L. Franklin, # 52066
David P. Frenzia, #60440
222 South Central Avenue, Suite 900
St. Louis, MO 63105
(314) 863-0092 – Telephone
(314) 746-4848 – Facsimile
cfranklin@lowenbaumlaw.com
dfrenzia@lowenbaumlaw.com

*Attorneys for Lucas Stucco Stone and Brick –
Masonry Division, LLC*

/s/ John J. Westerhaus (by consent)

Michael G. Newbold, # 25523
John J. Westerhaus, # 65266
1100 Main Street, Suite 2001
Kansas City, MO 64105
Telephone: (816) 421-5788
Facsimile: (816) 471-5574
mgnewbold@anwjpc.com
jjwesterhaus@anwjpc.com

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that I have on June 28, 2017, served a true and correct copy of the foregoing via the Court's e-filing system upon the following:

Michael G. Newbold, # 25523
John J. Westerhaus, # 65266
Arnold, Newbold, Winter & Jackson, P.C.
1100 Main Street, Suite 2001
Kansas City, MO 64105
Telephone: (816) 421-5788
Facsimile: (816) 471-5574
E-Mail: mgnewbold@anwipc.com
jjwesterhaus@anwipc.com

Attorneys for Plaintiffs

/s/ David P. Frenzia